

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

v.

WILLIAMS ALFREDO SEVERINO-JEREZ,

Defendant.

Case No. 25-525 (M)

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Luis Gonzalez-Encarnacion, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with Homeland Security Investigations and have been since December 2023. I am currently assigned to the Immigration Crimes Group in San Juan, Puerto Rico. Prior to my appointment as a Homeland Security Investigations Special Agent, I was appointed in 2019 as a Border Patrol Agent with the United States Border Patrol. As a Homeland Security Investigations Special Agent, I have received formal and on the job training and I am authorized to investigate violations of laws of the United States and to execute and serve any order, subpoena, summons, warrant, or other process issued under the authority of the United States. I am familiar with the statutes of the United States Code, and as a federal law enforcement officer, I have participated in investigations, surveillance, interviews, interrogations, arrests, searches, seizures, administration of oaths, and in taking and considering evidence concerning the privilege of any person to enter, reenter, pass through, or reside in the United States. Based on my law enforcement experience detailed herein, as well as my training, and experience of other law enforcement officers who are participating in this investigation, serve as the basis for the conclusion set forth herein.

2. This affidavit is submitted in support of a criminal complaint charging WILLIAMS ALFREDO SEVERINO-JEREZ with: (1) reentry of removed alien after an aggravated felony conviction in violation of Title 8, United States Code, Sections 1326(a) and (b)(2).

3. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge about this matter. I make this affidavit based on my own personal knowledge and on oral and written reports by other federal, state, and/or local law enforcement agents and officers that investigated this matter. This affidavit does not contain all the information derived from this investigation only that which is sufficient to demonstrate probable cause to believe that a crime has been committed.

**PROBABLE CAUSE**

4. Homeland Security Investigations (“HSI”) Special Agents received information from a source of information regarding WILLIAMS ALFREDO SEVERINO-JEREZ being illegally present in the United States. HSI investigators conducted records checks which revealed the following:

- a. Immigration checks revealed that WILLIAMS ALFREDO SEVERINO-JEREZ was not in possession of a valid unexpired immigrant visa, reentry permit, border crossing identification card, or other valid entry document.
- b. WILLIAMS ALFREDO SEVERINO-JEREZ had a 2014 JEEP CHEROKEE SPORT NEGRO bearing license plate IMY051 (“JEEP”) registered in Puerto Rico under his name.

5. On Friday, May 23, 2025, HSI conducted surveillance of the JEEP and observed WILLIAMS ALFREDO SEVERINO-JEREZ enter the JEEP and drive away. HSI investigators

proceeded to follow the JEEP to the Capetillo, San Juan area and approached WILLIAMS ALFREDO SEVERINO-JEREZ as he was exiting the vehicle.

6. HSI investigators requested WILLIAMS ALFREDO SEVERINO-JEREZ' name and identification. WILLIAMS ALFREDO SEVERINO-JEREZ identified himself as "Williams Alfredo Severino-Jerez" and provided his identification. HSI investigators asked WILLIAMS ALFREDO SEVERINO-JEREZ about his immigration status and WILLIAMS ALFREDO SEVERINO-JEREZ stated in sum and substance that he was in the United States illegally.

7. HSI determined that WILLIAMS ALFREDO SEVERINO-JEREZ was not in possession of a valid unexpired immigrant visa, reentry permit, border crossing identification card, or other valid entry document, and a valid unexpired passport, or other suitable document, or document of identity and nationality to enter, pass through, or remain in the United States. HSI determined that WILLIAMS ALFREDO SEVERINO-JEREZ is inadmissible to the United States, and HSI investigators arrested and transported WILLIAMS ALFREDO SEVERINO-JEREZ to Enforcement and Removal Operations Office in San Juan Processing Center for further processing.

8. HSI investigators conducted immigration and criminal history record checks of WILLIAMS ALFREDO SEVERINO-JEREZ which revealed the following:

- a. On February 14, 2020, WILLIAMS ALFREDO SEVERINO-JEREZ was found inadmissible and was Order of Removal by a Final Administrative Removal Order.
- b. On March 17, 2020, WILLIAMS ALFREDO SEVERINO-JEREZ was physically removed from the United States to the Dominican Republic.
- c. On May 2, 2019, WILLIAMS ALFREDO SEVERINO-JEREZ was indicted at the United States District Court for the District of Puerto Rico for Possession of a

firearm by an illegal alien in violation of Title 18, United States Code, Section 922(g)(5). *United States v. Severino-Jerez*, Case No. 19-cr-280 (ADC), ECF No.7 (D.P.R. May 2, 2019).

- d. On January 10, 2020, WILLIAMS ALFREDO SEVERINO-JEREZ pleaded guilty in the United States District Court for the District of Puerto Rico to a violation of 18 U.S.C 922(g)(5) Possession of a firearm by an illegal alien—a Class C felony. *United States v. Severino-Jerez*, Case No. 19-cr-280 (ADC), ECF No.46 (D.P.R. January 10, 2020).
- e. On February 11, 2020, the Court sentenced WILLIAMS ALFREDO SEVERINO-JEREZ to time served and three years of supervised release. *United States v. Severino-Jerez*, Case No. 19-cr-280 (ADC), ECF No.52 (D.P.R. February 11, 2020).

9. As of May 23, 2025, WILLIAMS ALFREDO SEVERINO-JEREZ had not submitted an application requesting permission to enter the United States (Form I-212) before the United States Citizenship and Immigration Services (“USCIS”). Thus, WILLIAMS ALFREDO SEVERINO-JEREZ has not obtained express consent from the Attorney General of the United States, or her successor the Secretary of Homeland Security to enter the United States, nor does he have any immigration documents allowing him to legally enter and/or remain in the United States.

10. On May 23, 2025, WILLIAMS ALFREDO SEVERINO-JEREZ a national and citizen of the Dominican Republic, was found in the United States after been previously removed from the United States. WILLIAMS ALFREDO SEVERINO-JEREZ was not admitted, inspected, or paroled into the United States by an immigration officer, nor did WILLIAMS ALFREDO SEVERINO-JEREZ present himself at a designed port of entry for inspection.

**CONCLUSION**

11. Based upon my training, experience, and facts concerning this investigation, I respectfully believe that there is probable cause to believe that WILLIAMS ALFREDO SEVERINO-JEREZ committed the following offense: (1) reentry of removed alien after an aggravated felony conviction in violation of Title 8, United States Code, Sections 1326(a) and (b)(2).

Respectfully submitted,

**LUIS O GONZALEZ-  
ENCARNACION**

Digitally signed by LUIS O  
GONZALEZ-ENCARNACION  
Date: 2025.05.28 09:50:16 -04'00'

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Luis Gonzalez-Encarnacion  
Special Agent  
Homeland Security Investigations

Sworn in accordance with the requirement of Fed. R. Crim. P. 4.1. by telephone at  
on this 28<sup>th</sup> day of May 2025, in San Juan, Puerto Rico.

11:49 AM



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HON. Marcos E. López  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF PUERTO RICO